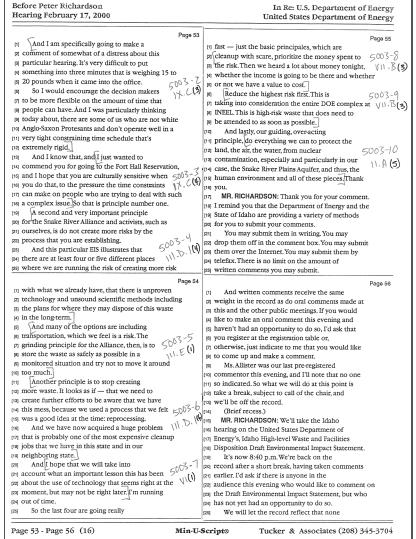
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March 23, 2000

Mr. Thomas L. Wichman Document Manager, U.S. Department of Energy, Idaho Operations Office 850 Energy Drive, MS 1108 Idaho Falls, Idaho 83401-1563

Dear Mr. Wichman,

Thank you for the opportunity to comment on the Idaho High Level Waste and Facilities Disposition draft Environmental Impact Statement (EIS). These comments are submitted on behalf of the State of Oregon. They should be considered as an addition to written comments provided by Ken Niles of my staff at the Portland public meeting on February

Our previous comments focused primarily on conditions under which Oregon could potentially consider future treatment of Idaho's high-level waste at Hanford. The comments provided here focus more on the technical elements of the draft EIS.

We have two overarching concerns with this draft EIS:

- We believe the "mix and match" philosophy of this EIS is inappropriate. Putting together pieces of different alternatives to create a hybrid alternative creates an 11.A(3) alternative that has not been analyzed in an integrated fashion in the EIS.
- This EIS is too hypothetical to be used as a decision making document. For example, construction on the facilities being considered for Hanford's own use in the Hanford 51-2 Option will not begin for several years even if they are approved and funded. Final waste dispositions discussed in the EIS rely on facilities still in the research, planning 11.E(2) and approval phase. The future existence of these facilities is not certain and is many years away at best. And these facilities may not be compatible with Idaho waste. 51-3 We recommend that Hanford references in this EIS be removed and re-evaluated and 11. E(2) the ROD deferred due to the large uncertainties associated with the alternatives being 51-4 11.E(2)

There is another point I would like to make. I am greatly concerned about the manner in which the Portland public meeting was conducted. Although the information provided was fair and understandable, I must object to the rigid format used in conducting the meeting. My staff suggested a less formal format to reflect the small turnout. We were 1x .C(3)



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FD EIS Page 2 of 3

Document 51, State of Oregon (Mary Lou Blazek), Salem, OR

interpretation of NEPA's requirements.

on public involvement efforts in Oregon.)

S. Huston of my staff at 503-378-4456.

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told this was not possible because the National Environmental Policy Act required that

Only five members of the public and two members of my staff attended the meeting.

One highly interested and knowledgeable individual left her sick child with her husband

to come to this meeting because of her passion about Hanford issues. She politely asked to give formal public comment after 90 minutes of presentations because she could not

stay for the formal public comment period. She was allowed to give her comment during the question and answer period but was told her comments were not on the record. After

giving her comments she was told that her comments were good but she should send

written comments if she wanted them on the record. This inflexible approach to public involvement and NEPA serves neither the public nor the U.S. Department of Energy.

Oregon Office of Energy staff also suggested a low cost facility which was not used. We

are ever vigilant about getting the best possible result for money spent. Please provide

More specific technical comments on the draft EIS are attached. Should you have any

questions about any of our comments, please contact me at 503-378-5544 or Mr. Douglas

(1) (2) the total cost of the Oregon public involvement effort to include meeting room and staff (1) travel costs and perdiem. This information will be used in an Oregon report to USDOE

each public meeting be conducted exactly the same. We do not agree with this

Nuclear Safety Division Oregon Office of Energy Appendix

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New Information

EIS PROJECT - AR PF-

1. This EIS does not consider all reasonable alternatives. For example, vitrification plants exist and are operating at West Valley and Savannah River. The EIS should examine the alternative of vitrifying Idaho's waste at these locations.

Section 3.1, "Description of Waste Processing Alternatives," lists five alternatives. Table 3-1
on the next page lists nine alternatives/options. This is confusing and should be clarified.

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3. As a result of the mix and match philosophy espoused in this EIS, Section 5 should analyze Hanford impacts for the Full Separations Option and Early Vitrification Option.

4. Appendix C.8, Section C.8.3.2, "Water Resources," page C.8-11, "Surface Water," does not discuss Oregon's extensive use of the Columbia River for irrigation, drinking water, electrical power generation, commerce and tourism. We recommend these uses of the river be included in this section, and that the EIS examine and explain the impacts on these uses from the various alternatives being considered.

5. The Hanford alternative is described as having a minimal impact on 52 acres of sage shrubsteppe habitat. However, no consultation was done with the Native American tribes in the area, or with the appropriate federal agencies to support this assertion. As a result of fires in sage shrub-steppe habitat. The State of Washington identifies this habitat as of special concern. It is home to about 17 species which are made to the special concern. the 1980s, much of this habitat was burned. This has drastically reduced the amount of prime concern. It is home to about 17 species which are under consideration for listing as rare, threatened or endangered. As Hanford cleanup proceeds, additional land will be required for processing and cleanup facilities. Even more land will be disturbed as a direct result of cleanup. The EIS fails to consider or analyze the cumulative impacts of all of these activities at Hanford. We recommend these impacts be considered in the EIS.

6. The models used to predict waste migration through the vadose zone and groundwater are overly simplified and fail to consider the broad uncertainties that occur due to preferential pathways and a general lack of understanding of the basic science involved in long term migration of radioactive materials through soil. We recommend that a discussion of these uncertainties be included in this EIS.

VIII . C (a)

7. Mobilization of plutonium and other actinides by the action of vegetative organic decay products such as humic and fulvic acids does not appear to have been considered, or by colloid formation and transport. We recommend these potential impacts be considered in the

8. This EIS should discuss how the Hanford Option would be funded and the impacts of the various funding options on Hanford and Idaho cleanup.